

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

EAST ORANGE BOARD OF EDUCATION
("EOBOE") AND NEW JERSEY SCHOOLS
INSURANCE GROUP ("NJSIG"),

Plaintiffs,

v.

GREAT AMERICAN INSURANCE
COMPANY ("GAIC"),

Defendant.

Civil Action No. 2:21-cv-15132-KM-CLW

**THIRD AMENDED
PRETRIAL SCHEDULING ORDER**

THIS MATTER having come before the Court on the parties' application for an extension of the discovery dates set forth in the Court's Amended Pretrial Scheduling Order filed on March 17, 2022 [ECF 16]; the parties having reviewed the Court's Civil Case Management Order as well as the Local Civil Rules; counsel for all parties having consented to the entry of this Amended Pretrial Scheduling Order; and for good cause shown,

IT IS on this 28th day of September, 2022

ORDERED that this matter will proceed as follows:

1. **Fact Discovery Deadline.** Fact discovery is to remain open through December 30, 2022. All fact witness depositions must be completed by the close of fact discovery. No discovery is to be issued or engaged in beyond that date, except upon application and for good cause shown.
2. **Motions to Add New Parties.** N/A
3. **Motions to Amend Pleadings.** N/A
4. **Rule 26 Disclosures.** The parties have already exchanged Rule 26 disclosures.
5. **Interrogatories.** The parties have responded to each other's interrogatories.
6. **Document Requests.** The parties have responded to each other's document requests.
7. **Depositions.** The number of depositions to be taken by each side shall not exceed 12.

8. **Electronic Discovery.** The parties are directed to Rule 26(f), as amended, which, *inter alia*, addresses preservation of discoverable information, discovery of electronically stored information, and claims of privilege or work product protection. The parties are also directed to Local Civil Rule 26.1(d) which describes the obligations of counsel with regard to their clients' information management systems.
9. **Discovery Disputes.** Please refer to the Court's Civil Case Management Order.
10. **Motion Practice.** Please refer to the Court's Civil Case Management Order.
11. **Expert Reports.** All affirmative expert reports shall be delivered by February 10, 2023. All responsive expert reports shall be delivered by March 31, 2023. Depositions of all experts to be completed by May 5, 2023.
12. **Form and Content of Expert Reports.** All expert reports must comport with the form and content requirements set forth in Rule 26(a)(2)(B). No expert shall testify at trial as to any opinions or base those opinions on facts not substantially disclosed in the expert's report.
13. **Extensions and Adjournments.** Please refer to the Court's Civil Case Management Order.
14. **Protective Orders.** Any proposed confidentiality order agreed to by the parties must strictly comply with Rule 26(c), Local Civil Rule 5.3, and applicable case law. Please also refer to the Court's Civil Case Management Order.
15. **Local Rules.** The parties are directed to the Local Civil Rules for any other matter not addressed by this Order or the Court's Civil Case Management Order.
16. **FAILURE TO COMPLY WITH THE TERMS OF THIS ORDER OR ANY OTHER ORDERS WILL RESULT IN SANCTIONS.**

s/ Cathy L. Waldor
CATHY L. WALDOR
United States Magistrate Judge